



Central Sierra Environmental Resource Center
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April 1, 2009

Beth Martinez, Program Area Leader
Chuck James, OHV Technician
Stanislaus National Forest
Mi-Wok Ranger District
P.O. Box 100
Mi Wuk Village, CA 95346

Dear Beth and Chuck:

On behalf of the Central Sierra Environmental Resource Center, please accept these comments regarding the grant applications that were submitted by the Stanislaus National Forest for consideration by the CA State Parks Off-Highway Motor Vehicle Recreation (OHVMR) Division.

As a local conservation group, we support appropriate OHV use in national forest areas where OHV use will not cause significant harm to natural resources or conflict significantly with quiet recreation use. Unfortunately, for many years CSERC has been strongly concerned with OHV use on the Stanislaus National Forest because such use at times does clearly affect water, soil, wildlife, plants, and non-motorized recreational visitors. It is our staff's opinion that the Stanislaus Forest has not consistently enforced OHV closures and has not consistently made resource protection a top priority. Thus, it would be easy for our Center to simply ignore the Forest's request for grant support. Instead, despite our concerns, we are providing this letter of support for the current grant requests that the Stanislaus Forest has submitted.

These grants, if awarded, will help the Forest to plan, implement, and restore several areas that are currently affected by unmanaged or inappropriate OHV use. We are especially supportive of those restoration efforts that are focused on preventing and restoring meadow damage. The delicate hydrology of meadows, the presence of special status plants, and the extremely valuable wildlife values of these meadow areas can quickly be severely degraded by careless OHV use. Efforts to protect these areas clearly deserve funding support.

We do have one comment regarding clarification of the number of miles of roads and routes available for OHV use. On page 1 of the Forest-wide Ground Operations grant application, the Forest states: "an additional 245 miles of routes are currently open and available for OHV use." The Forest is referring to the 245 miles of unauthorized, user-created routes that were mapped/identified as part of the Motorized Travel Management plan for the Stanislaus National Forest. As explained in the DEIS and by Forest staff, a good number of these miles of routes are not being proposed for approval in any alternative due to either conflicts with private property, a lack of legal easements, resource damage that cannot be mitigated, or the fact that the supposed user-created routes did not actually exist on the ground. Thus, based on our review of various sources of materials, it appears that no more than 181 miles of those user created routes are potentially available for any sort of approved OHV use, given a lack of easements, private property, and other constraints. However, well over 1,400 miles of OHV-suitable roads plus 95 miles of already approved OHV trails are also fully available for OHV use within the Stanislaus Forest, in addition to whatever final number of user created routes are added to the system.

In closing, our Center again notes our support for grant funding to assist the Forest in planning, managing, and enforcing a well-designed and appropriate OHV route system.

Thank you for consideration of these comments,

Brenda Whited, Staff Biologist

John Buckley, Executive Director